

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Kilaun Brooks,

Case No.

Case: 2:24-mj-30539

Judge: Unassigned,

Filed: 12-19-2024

CMP USA V. BROOKS (DA)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 19, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

There is probable cause to believe that on or about December 19, 2024, in the Eastern District of Michigan, Kilaun Brooks, violated 18 U.S.C. § 922(g)(1) (felon in possession of a firearm).

☒ Continued on the attached sheet.



Complainant's signature

Sean Thomas, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence and/or by
reliable electronic means.

Date: December 19, 2024

City and state: Detroit, MI



Judge's signature

Hon. Elizabeth Stafford, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, Sean Thomas, being duly sworn state the following is true and accurate to the best of my knowledge, information and belief.

1. I make this affidavit from personal knowledge based upon my participation in this investigation, with exception of the matters expressly stated, which are based upon information received from other law enforcement personnel and/or their reports and records. The information outlined below is provided for the limited purpose of establishing probable cause, and does not contain all details or facts that exist pertaining to the investigation.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been since July 2019. I am currently assigned to the FBI’s Detroit Division – Flint Resident Agency after serving one year with the FBI Boston Division’s Criminal Unit. From August 2020 through November 2020, I participated in Operation Legend at the FBI Chicago Division’s Violent Crime Unit. Prior to my employment with the FBI, I served as a Michigan State Trooper from 2012 until 2019, and was assigned to the Major Crime Unit and FBI Safe Streets Task Force, both in the City of Flint, Michigan. In 2008, I was certified as a police officer for the City of Nashua, New

Hampshire Police Department where I served as a uniform officer until June 2012.

3. I believe that Kilaun Brooks, DOB: XX/XX/1996, committed a violation of 18 U.S.C. section 922(g)(1), felon in possession of a firearm.

4. On December 19, 2024, I executed a search warrant at a residence that I believed to be associated with Brooks in Detroit, Michigan. I, along with other officers, executed the warrant at approximately 6:00 a.m.

5. Brooks and four other individuals were inside the residence at the time of the execution of the warrant.

6. As part of the execution of the search warrant, the individuals were ordered to exit the house prior to law enforcement entering. Other individuals at the residence stated that Brooks had slept that night on the couch in the living room.

7. Underneath the couch on the living room, law enforcement recovered a Taurus Model G3C, 9mm black semi-automatic pistol, which was loaded with a round in the chamber.

8. Brooks stated that he knew that the gun was in the house but that it belonged to another individual in the house who Brooks is related to, who also has a prior felony conviction. This individual claimed ownership of the

pistol. Brooks stated that he knew that he had a felony conviction and could not lawfully possess firearms.

9. Witness-1, another individual who stayed at the residence, told me that the gun is often out in the open at the residence. He/She stated that Brooks lives at the residence and has provided him/her with crack/cocaine for work on the residence.

10. Witness-2, also an adult individual who stays at the residence, stated that he/she observed Brooks holding the firearm in the living area of the house approximately two days prior to the execution of the search warrant.

11. Witness-3, another person staying at the residence, stated that she observed the gun in the house but had not observed Brooks holding it.

12. I have reviewed criminal history records for Brooks. Brooks has the following felony conviction:

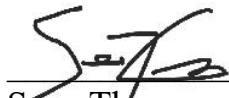
a. 2016 – Attempted Carrying a Concealed Weapon

This is a felony offense punishable by a term of imprisonment exceeding one (1) year.

13. On December 19, 2024, I spoke with Special Agent Dustin Hurt of the Bureau of Alcohol, Tobacco and Firearms & Explosives (ATF) in his capacity as an interstate nexus authority in the manufacture and movement of firearms and ammunition in interstate and foreign commerce. Special

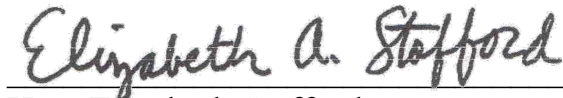
Agent Hurt determined that the Taurus Model G3C, 9mm black semi-automatic pistol, was manufactured outside of the State of Michigan, and is a firearm as defined in Chapter 44, Title 18, United States Code.

14. I, Special Agent Sean Thomas, therefore, have probable cause to believe that Brooks violated 18 U.S.C. section 922(g)(1), felon in possession of a firearm.



Sean Thomas
Special Agent, Federal Bureau of Investigation

Sworn to before me and signed in my presence and/or by reliable electronic means on this 19th day of December, 2024.



Hon. Elizabeth Stafford
United States Magistrate Judge